

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

In Re: ) BK: 24-01377-CW1-13  
Jeffery Wayne Lovell )  
Tiffany Nicole Lovell )  
Debtor )

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Response to: Trustee's Motion to Dismiss for Cause Pursuant to 11 U.S.C. § 1307(c)

Response Deadline: July 3, 2025

Hearing Date: July 16 2025

Time and Location: 9:30 a.m. Joint Hearing Courtroom (COL), Customs House, 701 Broadway, Nashville, TN 37203 (Virtual hearing if allowed; see Court website for details)

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**RESPONSE TO TRUSTEE'S MOTION TO DISMISS  
FOR CAUSE PURSUANT TO 11 U.S.C. § 1307(c)**

Comes the debtor, through counsel and would respond to the Trustee's Motion to Dismiss.

The debtors are scheduled to attend the Trustee's workshop on July 22, 2025

BASED UPON TEH FOREGOING, the debtor requests the Court to deny the Trustee's Motion to Dismiss and grant a hearing.

Respectfully submitted June 23, 2025

/s/ Keith D Slocum \_\_\_\_\_  
Keith D. Slocum BPR 023024  
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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I have mailed a true and exact copy of the foregoing to debtor, all parties in interest, and by Electronic Case Noticing to the Chapter 13 Trustee, Henry E. Hildebrand, III and to the U.S. Trustee's Office June 23 2025

/s/ Keith D Slocum \_\_\_\_\_  
Keith D. Slocum BPR 023024  
Slocum Law